

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Michael A. Gral¹,

Debtor-in-Possession.

Case No. 16-21329
Chapter 11

Jointly Administered

OBJECTION TO CLAIM NO. 2 OF BIELINSKI BROTHERS BUILDERS, INC.

Debtor hereby objects to Claim No. 2 of Bielinski Brothers Builders, Inc. ("BBB") and in support of the objection, alleges:

1. The Claim is invalid because there is no recorded and executed civil judgment nor a receiver's lien against this Debtor.
2. As there is no judgment, there can be no accrual of interest nor has the interest accrual been accurately computed.
3. The attorneys' fees of \$835,000.00 are unreasonable and as there is no judgment, there can be no claim for attorneys' fees.

WHEREFORE, Debtor demands that Claim No. 2 be denied.

Dated this 6 day of July, 2016.

LAW OFFICES OF JONATHAN V. GOODMAN
Attorneys for Debtor

By: 

Jonathan V. Goodman

¹ The court is jointly administering *In re Michael A. Gral*, Case No. 16-21329 and *In re Gral Holdings Key Biscayne, LLC*, Case No. 16-21330; and, separately, the court is jointly administering *In re Michael A. Gral*, Case No. 16-21329 and *In re Capital Ventures, LLC*, Case No. 16-21331. This pleading relates only to *In re Capital Ventures, LLC*, Case No. 16-21331.

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